

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**Hearing Date: June 25, 2025 at 9:30 A.M. ET  
Objection Deadline: June 11, 2025 at 4:00 P.M. ET**

**Ref. Nos. 30308 & 30334**

**CERTIFICATION OF COUNSEL REGARDING FTX RECOVERY TRUST'S  
ONE HUNDRED SEVENTIETH (SUBSTANTIVE) OMNIBUS OBJECTION  
TO CERTAIN OVERSTATED AND/OR UNLIQUIDATED  
PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust,<sup>2</sup> hereby certify as follows to the best of my knowledge, information and belief:

1. On April 28, 2025, the FTX Recovery Trust filed the *FTX Recovery Trust's One Hundred Seventieth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 30308, redacted & 30334, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection [D.I. 30308-1 & 30334-1], any responses to the Objection were to be filed no later than June 11, 2025, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The FTX Recovery Trust received an informal response (the “Informal Response”) to the Objection from the holder of claim number 96599.

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

4. On May 21, 2025, Jack Christopher Lucas (“Lucas”) filed a response to the Objection [D.I. 30453] (the “Lucas Response”).

5. On June 16, 2025, Krishna Prasad Rao (“Rao”) filed a response to the Objection [D.I. 30855] (the “Rao Response”).

6. As of the Date hereof, no other responses to the Objection have been filed or served on the FTX Recovery Trust.

7. The FTX Recovery Trust has revised the proposed form of order (“Revised Order”), a copy of which is attached hereto as Exhibit A, to reflect the adjournments of the Objection solely with respect to claim number 96599, Lucas’ claim, and Rao’s claim. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as Exhibit B. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

8. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: June 26, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Christian P. Jensen (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: dietdericha@sullcrom.com  
bromleyj@sullcrom.com  
gluecksteinb@sullcrom.com  
jensenc@sullcrom.com

*Counsel for the FTX Recovery Trust*